

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS**

In Re:

Mark Reinhold,

Debtor,

Chapter 7

No. 15-10976

**MOTION TO EXTEND TIME TO OBJECT TO DEBTOR'S DISCHARGE PURSUANT TO
11 U.S.C. SECTION 727 AND OR TO FILE EXCEPTION TO DISCHARGE COMPLAINT
PURSAUNT TO 11 U.S.C. SECTION 523**

Now comes Beth Mburu ("Mburu"), a creditor in the above referenced case, by Counsel, and hereby moves to extend the deadlines for filing an exception to discharge complaint pursuant to 11 U.S.C. Section 523 and or a denial of discharge complaint pursuant to 11 U.S.C. Section 727.

In support of this Motion, Mburu states as follows:

1. This case was commenced by the Debtor filing for relief on March 18, 2015.
2. The creditors meeting has yet to be concluded. The Chapter 7 Trustee has sought additional testimony and documents from the Debtor, which upon information and belief, have not been provided in full. A continued meeting of creditors has yet to be noticed.
3. Mburu, herself a Chapter 11 Debtor before this Court, being Case No. 14-15586, has a claim against the Debtor, including but not limited to a \$33,000.00 deposit on real estate located 27 Floyd Street, Dorchester, MA. Mburu is a creditor of the Debtor who, according to Debtor's proposed Amended Schedule F, holds an unsecured, liquidated,

- and disputed claim against the Reinhold for \$33,000.00, arising out of “deposits paid to River Bends Group.” The Debtor has acknowledged that the River Bends Group is his real estate brokerage company. In addition to the missing deposit money, according to the HUD-1 on the 27 Floyd Street, Dorchester, MA transaction, Mr. Reinhold’s Riverbends Group received payments of \$9,000.00 from Mburu’s closing proceeds and an additional \$12,840.00 from the Seller’s proceeds.
4. Mburu filed for and was granted the right to conduct a Rule 2004 examination in her bankruptcy case. The Debtor’s petition was filed two days prior to the scheduled examination. Thus Mburu was stayed from conducting the exam of the Mr. Reinhold.
 5. The Debtor has testified at his 341 meeting that Mr. Mark David Scott, who had knowingly surrendered his license, yet worked with and for the Debtor, was responsible for Mburu’s missing \$33,000.00 deposit. On information and belief, on May 29, 2015, Mr. Scott pled guilty to 32 counts of wire fraud, 13 counts of bank fraud, and 22 counts of money laundering. He is scheduled for sentencing on August 26, 2015 at which time he faces an estimated sentencing guidelines range of 262 to 327 months of incarceration. The Debtor further testified that he failed to keep an escrow account for deposits, but rather put said deposits into his general operating account. Mburu has yet to review the records of the Debtor’s accounts not has she been afforded the opportunity to question the Debtor under oath as to these records.
 6. Because of the complexity in this case, Mburu seeks an extension of ninety (90) days on the deadlines for filing an exception to discharge complaint pursuant to 11 U.S.C. Section 523 and or a denial of discharge complaint pursuant to 11 U.S.C. Section 727.

WHEREFORE, for the reason stated herein, Mburu requests that this Court extend the deadlines for filing an exception to discharge complaint pursuant to 11 U.S.C. Section 523 and or a denial of discharge complaint pursuant to 11 U.S.C. Section 727 to September 15, 2015, and for all other relief deemed just and equitable.

Respectfully submitted this 10th day of June 2015.

/s/John F. Sommerstein
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached Motion to Extend Deadlines for filing an Exception to Discharge Complaint pursuant to 11 U.S.C. Section 523 and or a Denial of Discharge Complaint pursuant to 11 U.S.C. Section 727 was served upon the U.S. Trustee and those parties listed below entitled to electronic notice through Court's CM/ECF system.

/s/John F. Sommerstein
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